

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

EQUAL EMPLOYMENT OPPORTUNITY)	
COMMISSION,)	
)	
and)	
)	
MARGARITA FUENTES, MIRNA PACAJA,)	
and ESDEYRA ROSALES)	
Plaintiff's-in-Intervention)	
)	CIVIL ACTION NO. 17CV11860
)	
Plaintiff)	
)	
v.)	
)	
ATLANTIC CAPES FISHERIES, INC. and,)	
BJ'S SERVICE CO., INC.)	
)	
Defendants.)	
)	

JOINT MOTION TO APPROVE CONSENT DECREE

Plaintiff Equal Employment Opportunity Commission, Defendants Atlantic Capes Fisheries, Inc. and BJ's Service Co., Inc. and Plaintiff Intervenors, Mirna Pacaja, Margarita Fuentes and Esdeyra Rosales (collectively "Parties"), jointly move, through their undersigned counsel, that this Court APPROVE the attached Consent Decree, which has been signed and approved by the Parties. The signed Consent Decree is attached hereto as Exhibit 1. The Consent Decree states that the Court shall retain continuing jurisdiction to enforce the provisions of the Decree.

WHEREFORE, the Parties jointly respectfully request that the Court GRANT their motion.

Dated: January 29, 2019

Respectfully submitted,

<p>ATLANTIC CAPES FISHERIES, INC.,</p> <p><u>/s/ Jessica S. Jewell</u> Stacie B. Collier (BBO #645172) Jessica S. Jewell (BBO #679489) NIXON PEABODY LLP 100 Summer Street Boston, MA 02110 (617) 345-1000 (telephone) (617) 345-1300 (fax) sbcollier@nixonpeabody.com jsjewell@nixonpeabody.com</p>	<p>U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION</p> <p><u>/s/ Sara Smolik</u> SARA SMOLIK (BBO#661341) Senior Trial Attorney U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION Boston Area Office John F. Kennedy Federal Building Room 475 Boston, MA 02203-0506 (617) 565-3207 (telephone) (617) 565-3196 (fax) sara.smolik@eeoc.gov</p> <p>ADELA SANTOS Senior Trial Attorney U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION New York District Office 33 Whitehall Street, 5th Floor New York, NY 10004-2112 (212) 336-3696 adela.santos@eeoc.gov</p>
<p>BJ'S SERVICE CO., INC.</p> <p><u>/s/ Matthew C. Mastromauro</u> Nancy A. Serventi (BBO #452100) Christopher W. Costello (BBO #645936) Matthew C. Mastromauro (BBO #679049) McDonough, Hacking & Lavoie, LLC 27 Congress Street, Suite 404 Salem, MA 01970 (617) 367-0808 (telephone) nserventi@mhlattys.com ccostello@mhlattys.com mmastromauro@mhlattys.com</p>	<p>MARGARITA FUENTES, MIRNA PACAJA, AND ESDEYRA ROSALES</p> <p><u>/s/ James A.W. Shaw</u> James A.W. Shaw (BBO #670993) SEGAL ROITMAN, LLP 33 Harrison Ave., 7th Floor Boston, MA 02111 (617) 603-1432 (telephone) (617) 742-2187 (fax) jshaw@segalroitman.com</p>

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2019, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system, which then electronically notified all those registered as CM/ECF participants in this case.

/s/ Sara Smolik

Sara Smolik